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VIA ECF

July 2, 2024

Honorable James R. Cho
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *L.B. v. City of New York et al*, 1:23-CV-08501 (RPK) (JRC)
Unopposed Letter Motion to Adjourn Initial Conference

Your Honor:

We represent Plaintiffs L.B. individually and on behalf of her minor child “Kyle,” proceeding under a pseudonym (“Plaintiffs”) in the above-referenced action. Plaintiffs respectfully submits this unopposed letter-motion to the Court for an adjournment of the initial conference scheduled for July 31, 2024 at 11:00 A.M. in Courtroom 11D before Your Honor.

Plaintiffs make this motion due to a pre-existing scheduling conflict of Plaintiffs’ counsel. Pursuant to Your Honor’s Individual Practice C, Plaintiffs submit that this motion for an adjournment is supported as follows.

First, Plaintiffs have made no previous requests for an adjournment of this initial conference. Second, Plaintiffs’ counsel communicated the basis for the adjournment request to Defendants’ counsel, who has consented to the request and does not oppose this motion. Third, given the early stage of this action, Plaintiffs’ request does not affect any other scheduled Court appearance or deadline. Finally, Plaintiffs’ motion is made more than two (2) business days prior to the appearance as currently scheduled.

Accordingly, and with Defendants’ consent, Plaintiffs propose that the initial conference be adjourned to one of the following dates, subject to the Court’s availability: August 1, 5, 6, 8, 9, 12-14, or 16.

July 2, 2024

For the foregoing reasons, Plaintiffs respectfully request the Court grant this unopposed motion for adjournment of the initial conference to a date in August as proposed by the parties, or as soon thereafter as is convenient for the Court. Plaintiffs thank the Court for its consideration.

Respectfully submitted,

/s/ Robert A. Mantel
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